



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION III  
1650 Arch Street  
Philadelphia, Pennsylvania 19103-2029**

**CERTIFIED AND ELECTRONIC MAIL -  
RETURN RECEIPT REQUESTED**

**MAY 01 2015**

Larry Biss, Managing Director  
Gehring Montgomery, Inc.  
710 Louis Dr.  
Warminster, PA 18974

**Re: CAA 112(r)(7) Inspection of Gehring Montgomery, Inc. Plant on October 27, 2014  
Post Inspection Letter**

Dear Mr. Biss:

The United States Environmental Protection Agency ("EPA") would like to thank you and your staff for providing Alfred Baginski and Kevin Daniel with the opportunity to inspect the Facility located at 710 Louis Dr. in Warminster, PA 18974 ("Facility") on October 27, 2014. EPA's inspection was conducted to ensure Gehring Montgomery, Inc.'s regulatory compliance with Section 112(r)(1), of the Clean Air Act ("CAA"), also known as the General Duty Clause, as amended, 42 U.S.C. §§ 7401 et seq., 42 U.S.C. § 7412(r)(1). Part of the overall goal of EPA Region III's Chemical Accident Prevention Program is to promote accident prevention and chemical awareness at facilities handling hazardous substances.

The purpose of this letter is to inform you that, during the General Duty Clause portion of the inspection, EPA observed the Facility's warehouse storage process, and a recommendation to improve the safety of the process. This recommendation, considered "good engineering practice" by Region III, is listed below.

- 1) Conduct emergency response drill with local fire departments.

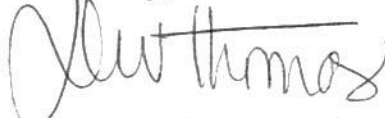
Gehring Montgomery, Inc. is not required to implement this "good engineering practice" and EPA would not pursue an enforcement action for Gehring Montgomery, Inc.'s decision not to implement all or some of the recommendation above. However, EPA encourages Gehring Montgomery, Inc. to implement the recommendation, as doing so will help Gehring Montgomery, Inc. meet the goals of the risk management program, *i.e.*, to prevent accidental releases of chemicals that could cause serious harm to human health or the environment and reduce the severity of releases that may occur. Please contact Mr. Kevin Daniel if you would like to discuss the rationale for or implementation of any of the above recommendations. Further, as a courtesy, please advise us, in writing, within sixty (60) calendar days whether the Facility will be implementing the listed good engineering practice recommendation.

Case No. 15-PA-GDC-015

This letter does not constitute a waiver, suspension or modification of the requirements of, including but not limited to, Section 112(r) of the Clean Air Act, 42 U.S.C. § 7412(r), or any regulations promulgated or enforcement authority thereunder. Further, nothing herein shall be construed to limit the authority of EPA to undertake action against any person, including Ter Hell & Co. GMBH, in response to any condition which EPA determines may present a hazard, or an imminent and substantial endangerment to the public health, public welfare or the environment.

Should you have any questions, please contact Kevin Daniel at (215) 814-3247. All correspondence should be sent to the attention of Kevin Daniel at the following address: USEPA, 1650 Arch Street (3HS61), Philadelphia, PA 19103.

Sincerely,

A handwritten signature in dark ink, appearing to read "Donzetta Thomas". The signature is fluid and cursive, with a long horizontal line extending from the end.

Donzetta Thomas, Acting Chief  
Oil and Prevention Branch